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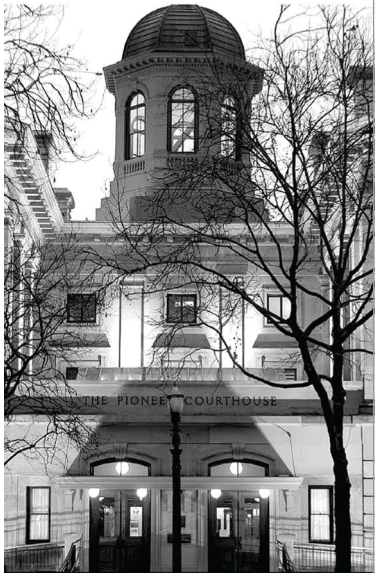
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian ad litem,
on behalf of S.M., a minor,

Plaintiff,

vs.

Case No. 6:20-cv-01163-MK

MARK DANNELS, et al.,

Defendants.



DEPOSITION OF

GABRIELLA CATO

**TAKEN ON
THURSDAY, JULY 6, 2023
1:09 P.M.**

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1 **DEPOSITION OF**
2 **GABRIELLA CATO**
3 **TAKEN ON**
4 **THURSDAY, JULY 6, 2023**
5 **1:09 P.M.**

6
7 **THE VIDEOGRAPHER:** We are on the Record.
8 The time is 1:09, the date is July 6, 2023. This is
9 the beginning of the deposition of Gabriella Cato.
10 The case caption is McGuffin v. Dannels.

11 Will the counsel now introduce yourself
12 and state whom you represent.

13 **MS. PURACAL:** Janis Puracal for Plaintiff.

14 **MR. LAUERSDORF:** Andy Lauersdorf on behalf
15 of Plaintiff.

16 **MR. FRANZ:** Robert Franz on behalf of the
17 municipal defendants and the police officers.

18 **MS. SAWYER:** Meredith Sawyer on behalf of
19 Vidocq Society.

20 **MR. MARSHALL:** Todd Marshall on behalf of
21 the State defendants.

22 **MR. DEFREEST:** Eric DeFreest on behalf of
23 Richard Walter.

24 **THE VIDEOGRAPHER:** The court reporter may
25 now swear in the witness.

1 **THE REPORTER:** All right. Ms. Cato,
2 please raise your right hand. Thank you.

3 Do you affirm under penalty of perjury
4 that you are Gabriella Cato and that the testimony
5 you are about to give will be the truth, the whole
6 truth, and nothing but the truth?

7 **THE WITNESS:** Yes.

8 **GABRIELLA CATO**, having been duly sworn, was examined
9 and testified as follows:

10 **THE REPORTER:** Thank you. Counsel, you
11 may proceed.

12 **EXAMINATION**

13 **BY MR. FRANZ:**

14 **Q.** My name's Robert Franz, and as indicated,
15 I represent the municipal defendants and police
16 officers in a lawsuit brought by Mr. McGuffin. So
17 take a deep breath, just relax.

18 **A.** Okay.

19 **Q.** We have a lot of attorneys here. A couple
20 of us will be asking questions. Your job is very
21 simple, just answer truthfully the questions we ask
22 you.

23 And the reason I subpoenaed you in is
24 because I wanted to get some more information about
25 a lawsuit that you filed against Legend's Bar and

1 Grill. So I need to have an exhibit marked, and then
2 I'm going to ask you some questions.

3 MR. FRANZ: So are we doing one again?

4 MR. LAUERSDORF: I guess, yes.

5 (WHEREUPON, a Supplemental First Amended
6 Complaint was marked as Exhibit 1 for
7 identification.)

8 BY MR. FRANZ:

9 Q. So do you recognize this complaint?

10 A. Yes.

11 Q. Okay. So what I want to do is just kind
12 of go through the complaint and ask you some
13 information or where you got the information that's
14 in the complaint.

15 A. All right.

16 Q. And then we will just go through the
17 allegations like that, okay? You are going to be
18 fine.

19 So if you turn to page 3, and we start off
20 with the statement you were hired in August of 2019
21 as Events Supervisor. Can you explain a little bit
22 to us, when did you apply to Legend's?

23 A. The day I was hired.

24 Q. Okay. So you just, you came in, you
25 applied and got a job?

1 A. I moved into Molalla. I was supervisor at
2 Mt. Hood Meadows ski resort for approximately 16
3 years and moved to Molalla.

4 My husband passed and I moved by my
5 children, and the only place in Molalla that had
6 events and things like that was Legend's. So a
7 couple weeks after I settled into my house, I
8 applied and was hired.

9 **Q. How young are you?**

10 A. I'm 60 years old.

11 **Q. And who did you interview to get the job?**

12 A. Jessica was my -- the manager there, and
13 Rebecca was the events manager.

14 **Q. Do you have last names?**

15 A. I don't. I'm very sorry. I did but --

16 **Q. And was Mr. McGuffin working there when**
17 **you worked there?**

18 A. He was not.

19 **Q. Do you remember when he came to work**
20 **there?**

21 A. I do.

22 **Q. Okay. When?**

23 A. It was the spring before the November I
24 was let go so 2020 or '21, I'm not quite sure.

25 **Q. Okay. So you were August 2019.**

1 A. I think '21.

2 Q. So you think the rest of 2019 and all of
3 2020, then 2021?

4 A. Yes.

5 Q. Okay.

6 A. I believe so.

7 Q. And before Mr. McGuffin got there, were
8 you doing a good job?

9 A. Yeah, I loved my job.

10 Q. And did the people like you?

11 A. Very much.

12 Q. Was there any complaints made against you?

13 A. None.

14 Q. So now when Mr. McGuffin gets there, what
15 does he do?

16 A. Very exciting for us because banquets, and
17 we were struggling in that department, and it was
18 really exciting to see him come aboard.

19 Q. Okay. Now, will you look at page 3,
20 paragraph 11 where it says, The young women would
21 tell Plaintiff about things that were bothering them
22 or ask her to assist them -- assist them if they
23 needed help. Do you see where I am?

24 A. I don't, I'm so sorry.

25 Q. Yeah, it's page --

1 A. Oh, okay. Yes.

2 Q. Okay. What women came to you to complain
3 about Mr. McGuffin?

4 A. We have hostesses that are from 15 to,
5 say, early twenties. My servers that were -- they
6 were like my kids. I've always been like that.
7 They were like 19, 18, 19. Coworkers, but young
8 women.

9 Q. And what was the nature of the complaints?

10 A. Just making them feel uncomfortable, you
11 know, just came to -- I didn't really know what to
12 do with the complaints, you know, just uncomfortable
13 in a kind of sexual manner, I suppose --

14 Q. Okay.

15 A. -- is what I took it as.

16 MR. FRANZ: So need this marked. Okay.
17 So this is that material I got from Fisher by the
18 subpoena.

19 THE REPORTER: Are you marking this?

20 MR. FRANZ: It's Number 2, correct.

21 (WHEREUPON, an Employee Address List was
22 marked as Exhibit 2 for identification.)

23 BY MR. FRANZ:

24 Q. I want you to go through Exhibit 2, yes,
25 and could you read off the names of the persons that

1 **complained to you? There's quite a few pages so**
2 **just take your time.**

3 A. Emma.

4 **Q. What's the last name?**

5 A. Cortes, C-o-r-t-e-s.

6 **Q. What page is it on?**

7 A. Second page.

8 **Q. What's the --**

9 A. Second page.

10 **Q. Second page, okay. Cortes.**

11 A. Desiray Ward, fourth page. I'm looking
12 for Jazmin. I can't find her.

13 **Q. Third page, number 4 -- 317.**

14 A. Yes, Jazmin Spinney. And those are the
15 ones that came to me.

16 **Q. What about Abbi?**

17 A. Who?

18 **Q. An Abbi Beckham?**

19 A. No.

20 **Q. Okay. Okay. So what did Emma come to you**
21 **about, what did she say?**

22 A. That he was asking her out, you know, and
23 just being flirtatious, and then more so other girls
24 coming to me about that situation between Emma and
25 him. So --

1 Q. And do you know how old Emma was?

2 A. I do not. Early twenties.

3 Q. And then other girls would also complain
4 on behalf of Emma?

5 A. Just say things to me, you know, nothing
6 that I -- I didn't take that as the reason that I
7 filed my complaint, was just, you know, hearsay and
8 work and, you know.

9 Q. And then what did Desiray complain about?

10 A. Same thing.

11 Q. Did either Emma or Desiray give you some
12 specifics?

13 A. No.

14 Q. Did they show you some text messages?

15 A. No.

16 Q. And then what did Jazmin come to you
17 about?

18 A. She said that he was starting -- well, at
19 first she was encouraging the flirtation at work.
20 She -- Jazmin was 18, just turned 18, and she was
21 kind of excited about it.

22 And then he started sending her -- and I
23 did not see these, this is her telling me -- sending
24 her pictures of his anatomy, a video of himself
25 washing in the shower, things that she was she

1 startled about and upset about because it upset her.

2 **MR. LAUERSDORF:** I'm going to assume that
3 all the hearsay objections are preserved.

4 **MR. FRANZ:** Yes.

5 **MR. LAUERSDORF:** Do you want me to object
6 every time she -- okay.

7 **MR. FRANZ:** No. I think the only
8 objections is form of the question, responsiveness
9 of the answer.

10 **MR. LAUERSDORF:** Okay.

11 **BY MR. FRANZ:**

12 **Q. Okay. And then what, if anything, did you**
13 **do?**

14 **A.** Well, I had observed some behavior that I
15 felt was disruptive to the workplace and to the, you
16 know, making everything go well at work and so I
17 went to my boss, again, without seeing any direct
18 except for the flirtation and, you know, kind of
19 inappropriate for a workplace.

20 Again, not seeing the pictures or
21 anything, I went to my manager, Jake Shafer and just
22 told him my concerns.

23 **Q. And what behavior had you observed**
24 **personally?**

25 **A.** Flirting with a 16-, 17-year-old,

1 touching, flirting, giggling. She wasn't doing her
2 job, she was just following him around, and they
3 were, you know, and it was just not professional.

4 **Q. And who was the girl?**

5 A. Georgia.

6 **Q. Did you see touching?**

7 A. Yeah, grabbing an arm and, you know, that
8 kind of thing, but nothing, you know.

9 **Q. Do you know where Georgia is today?**

10 A. I do not.

11 **Q. Are you still working at Legend's?**

12 A. Oh, no.

13 **Q. When did you leave?**

14 A. I left after I filed my complaint. They -
15 - we went back and forth with emails and stuff, and
16 I was fired for the complaint.

17 **Q. And then did -- and you never went back?**

18 A. Never.

19 **Q. Tell me how you were fired. What**
20 **happened?**

21 A. Well, I was -- I went to work, I had an
22 event. I -- okay, back up. I went back and forth
23 with Jake, and he was, you know, he wasn't
24 responding.

25 So then I sent an email to the owners, and

1 I had a banquet the next morning and I said I wanted
2 a meeting before the banquet.

3 And -- and so I went there early, but the
4 meeting didn't happen, but the event was for the
5 golf ladies, and it was important and so I thought
6 I'd just go to work. And so I was in uniform, I
7 went to work, and Jake came to me and said, We don't
8 need you. Go home.

9 And I was like, okay, and so I went home,
10 and then I sent more emails to human resource, to
11 the owners, to everything, and they just didn't get
12 back to me, and then I was taken off the site, the
13 schedule.

14 And I was, like, what's going on? And
15 then I finally got a response from Bryce Fisher,
16 said that I had been terminated.

17 **Q. Were you given a reason?**

18 A. There were no reasons at that time.

19 **Q. Okay. Now, we issued a subpoena on**
20 **Legend's to try to get copies of anything dealing**
21 **with Mr. McGuffin, and we got one piece of paper.**
22 **We didn't get any emails that you sent or anything.**
23 **Do you still have those?**

24 A. I -- I do.

25 **Q. Okay.**

1 A. But my -- the suit and everything was not
2 with Mr. McGuffin, it was with Legend's and the way
3 they handled by complaint, not the complaint itself.

4 Q. Correct. So can -- can I get a phone
5 number from you to contact you to try to get those
6 documents? What's a good phone number?

7 A. 503-317-9335.

8 MR. LAUERSDORF: 513-317 what?

9 THE WITNESS: 9335.

10 MR. LAUERSDORF: Okay. We're going to
11 serve her today with a subpoena duces tecum as well
12 so.

13 MR. FRANZ: Okay. So she has to come
14 back?

15 MR. LAUERSDORF: We haven't seen the
16 documents. I mean, I want to ask her about the
17 documents.

18 MR. FRANZ: Okay. So what -- let's go off
19 the Record a second.

20 THE VIDEOGRAPHER: The time is 1:25, and
21 we are off the Record.

22 (WHEREUPON, a discussion was held off the
23 Record.)

24 THE VIDEOGRAPHER: 1:29 and we are back on
25 the Record.

1 BY MR. FRANZ:

2 Q. Okay. So I want to ask about what is your
3 understanding of the settlement agreement you
4 entered in with Legend's about disclosing it or not
5 disclosing it?

6 A. I am not to talk about it.

7 Q. And not talk about what led up to the
8 settlement or not talk about the amount or the
9 actual terms of the settlement? What's your
10 understanding?

11 THE WITNESS: The settlement with the golf
12 course and with Jake, I didn't -- I don't know. I
13 don't think I'm supposed to talk about it. My
14 initial complaint wasn't the reason for the suit, it
15 was how it was handled.

16 BY MR. FRANZ:

17 Q. And the fact you were terminated?

18 A. Right.

19 MR. FRANZ: Okay. So on the Record, my
20 suggestion is we stop the deposition, we send an
21 email to Kasubhai, Judge Kasubhai, tell him that the
22 witness understands that she can't disclose it,
23 she's not represented by an attorney, and that we
24 ask him to issue an order requiring her to answer if
25 he's comfortable with that. And, Andrew, your

1 position?

2 **MR. LAUERSDORF:** My position is that she
3 hasn't been asked any questions about the settlement
4 agreement. There's no reason to stop the
5 deposition.

6 **BY MR. FRANZ:**

7 **Q.** So let's continue outside of that part. I
8 won't be asking you about that. Did you have
9 conversation with Georgia about her relationship
10 with Mr. McGuffin?

11 A. No.

12 **Q.** And did you have conversations -- did you
13 ever any conversations at all with Georgia?

14 A. Yes.

15 **Q.** Just about business?

16 A. Uh-huh.

17 **Q.** Yes?

18 A. Yes.

19 **Q.** And do you know any background information
20 about Georgia?

21 A. Not really.

22 **Q.** Do you know if she in fact was dating Mr.
23 McGuffin?

24 A. No. At that time, no.

25 **Q.** Do you know if sometime she was?

1 A. Just, I -- just rumors that I heard.

2 Q. What rumors did you hear?

3 A. That she was dating him.

4 Q. And do you know what age she would have
5 been when she was dating him?

6 A. No, I don't.

7 Q. Do you know what time of the year it was,
8 for example, you say that he got there in 2021, Mr.
9 McGuffin, what year or what month it was that you
10 heard he was dating Georgia?

11 A. January '22 I believe, maybe. It was
12 after I had left.

13 Q. Do you know Georgia's parents?

14 A. Casually.

15 Q. Did you ever have any discussion with them
16 about Georgia's relationship with Mr. McGuffin?

17 A. I did not.

18 Q. And do you know the names of Georgia's
19 parents?

20 A. No, I don't.

21 Q. Okay. What did Jazmin tell you?

22 A. She told me that he was pursuing her
23 sexually and followed her to the car and tried to
24 kiss her and just some different things like that.
25 I saw none of that, this is just what she told me.

1 Q. Now, do you know if Georgia got
2 terminated?

3 A. I do not.

4 Q. Did -- do you know if Jazmin got
5 terminated?

6 A. Yes, she did.

7 Q. And when did she get terminated?

8 A. At the same time I did.

9 Q. And do you know why Jazmin got terminated?

10 A. I really don't. I mean, it could have
11 been because she didn't go to her shift that day.
12 I'm not sure. Because her mother wouldn't let her
13 go to work.

14 Q. How do you know that, is that Jazmin told
15 you that?

16 A. Yes.

17 Q. Did you -- did you know a Megan Davidson?

18 A. I -- possibly. I worked with many girls,
19 I don't know.

20 Q. This would have been an older woman that
21 was a dishwasher.

22 A. I know the dishwashers. I sound terrible,
23 but I don't know everybody's name.

24 Q. She was a dishwasher that knew Mr.
25 McGuffin in high school.

1 A. No, I didn't know her.

2 Q. So you mentioned in your complaint that
3 Defendant Shafer was hired in May of 2021, correct?

4 A. Approximately. I don't know exactly.

5 Q. And you said once he was on board, he
6 hired several of his male friends, including Mr.
7 McGuffin. How do you know that Shafer and McGuffin
8 were friends?

9 A. That's what I was told, that he was
10 bringing people that he knew and were friends.

11 Q. Do you know how they knew each other?

12 A. Previous restaurant maybe? I don't know.
13 No, I don't.

14 Q. What other friends did Mr. Shafer hire
15 that were his friends?

16 A. Our Chef Bobby, I don't know his last
17 name, a bartender, a bar back, some just different
18 people in the operation.

19 Q. Was there other relationships between male
20 workers at Legend's and female employees?

21 A. Not that I know of. I know there's a
22 couple of servers, but they were in a relationship
23 when they started working there, and they worked
24 there together, but not that I know of, no.

25 Q. Are you working now?

1 A. I am.

2 Q. Where are you working?

3 A. I work at the Buckeroo Deli in Molalla.

4 I'm a -- it's like a gambling place. I take care of
5 lottery, I cook food, I wait on people.

6 Q. And what is your current address?

7 A. 212 Shaver Avenue, Molalla.

8 Q. So I had the correct address on the
9 subpoena?

10 A. Yes.

11 Q. Did you ever approach Mr. McGuffin about
12 his conduct?

13 A. No.

14 Q. Did you ever talk to him at all?

15 A. Well, yeah, we had talked, but not about
16 any of this.

17 Q. Okay. So the topic of his conduct was
18 never discussed between the two of you?

19 A. No. I went to my manager.

20 Q. And other than the people that you have
21 named, can you remember any other women that
22 complained to you?

23 A. I can't.

24 MR. FRANZ: All right. That's all the
25 questions I have.

1 **MR. LAUERSDORF:** Anybody else?

2 **MR. MARSHALL:** Pass the witness.

3 **MS. SAWYER:** No questions.

4 **EXAMINATION**

5 **BY MR. LAUERSDORF:**

6 **Q.** All right. Ms. Cato, my name is Andy
7 Lauersdorf. I'm an attorney representing Mr.
8 McGuffin. You heard me talk about that earlier,
9 right?

10 **A.** Uh-huh, yes.

11 **Q.** I'd like to ask you a few questions as
12 well. You said that you were a supervisor at Mt.
13 Hood Meadows for 16 years; is that right?

14 **A.** Approximately.

15 **Q.** In which part of Meadows?

16 **A.** Their restaurants. There's three
17 restaurants, and I supervised them.

18 **Q.** Okay. Who was your immediate supervisor?

19 **A.** Barbara Gearhart and the director is Mark
20 Fellows.

21 **Q.** And you said you stopped working there
22 after Mr. Warner passed?

23 **A.** Yes.

24 **Q.** How long were you married to Mr. Warner?

25 **A.** We were married for two years, but we were

1 together 10 maybe. I'm not sure exactly.

2 **Q. Why didn't you take his name?**

3 A. I just didn't. My -- I have sons and
4 grandchildren with Cato and --

5 **Q. But you have sons that have the name Berry**
6 **as well, right?**

7 A. My oldest son is Berry, yes.

8 **Q. So why keep Mr. Cato's name?**

9 A. It was just something I did. I intended
10 to change to Warner, but I didn't.

11 **Q. And that was even after Mr. Cato's**
12 **convictions?**

13 A. Yes.

14 **Q. And prison and everything?**

15 A. Yes.

16 **Q. Okay. Other than Meadows and the BUCKEROO**
17 **cafe and Legend's, did you work anyplace between**
18 **Legend's and Buckeroo Cafe?**

19 A. No.

20 **Q. Okay. And before you worked at Legend's,**
21 **did you work anywhere other than Mt. Hood Meadows or**
22 **did you go straight from Meadows to Legend's?**

23 A. Well, I worked at Gustav's off and on for,
24 excuse me, five years, but I'm not sure. The ski
25 resort was seasonal so I would work different places

1 in the summer so I'm not really --

2 **Q. Okay. What are the other places you**
3 **worked at?**

4 A. I worked at the Resort at the Mountain, I
5 worked at the Territory, and Gustav's.

6 **Q. What's -- where's the Territory?**

7 A. In, I believe, Welches.

8 **Q. Who was your direct supervisor at the**
9 **Territory?**

10 A. A couple owns it and so they were my -- I
11 can't remember their name.

12 **Q. Okay. When did you leave there?**

13 A. 2017 maybe? Around there.

14 **Q. Okay. And why did you leave there?**

15 A. It was a summer job.

16 **Q. Okay. What about the Resort at the**
17 **Mountain, who was your direct supervisor there?**

18 A. I'm so sorry, I don't know. And again,
19 that was a summer job so.

20 **Q. When did you leave there?**

21 A. 2016, '17, something like that. I worked
22 there a few summers.

23 **Q. How about Gustav's, who was your direct**
24 **supervisor there?**

25 A. Gosh, my mind, I can't think of anyone's

1 names. I don't know at the moment. I can't think.

2 Q. When did you leave there?

3 A. 2017.

4 Q. Why did you leave there?

5 A. Summer employment, going back to the
6 mountain.

7 Q. Okay. Gustav's, which location?

8 A. Clackamas.

9 Q. And then who was your direct supervisor at
10 Legend's?

11 A. Jake Shafer.

12 Q. And he was the GM?

13 A. Yes.

14 Q. Was there anyone that you reported to
15 other than Mr. Shafer?

16 A. No.

17 Q. Okay. So other than the Territory, the
18 Resort at the Mountain, Gustav's, Mt. Hood Meadows,
19 Legend's, and Buckeroo Cafe, were there any -- are
20 there any other places that you've worked between,
21 say, 2012 and 2023?

22 A. Not that I can remember, no.

23 Q. Okay. And you said your current address
24 is on what street?

25 A. Shaver.

1 Q. How long have you been at that address?

2 A. I think going on six years, I think.

3 Q. So from 2017 to 2023?

4 A. Yeah. Yes.

5 Q. Where did you live before that?

6 A. I lived in -- I was with my mother in
7 Welches for a year.

8 Q. What's the address there?

9 A. 25222 East Welches Road, Welches, Oregon.

10 Q. From 2016 to 2017?

11 A. Right after my husband passed, I moved in
12 with my mother, yes.

13 Q. Okay. Where did you live before that?

14 A. In Brightwood with my husband.

15 Q. What was the address?

16 A. I -- I don't remember. Wild Fern Lane. I
17 don't remember the street address.

18 Q. Your husband was a concrete contractor?

19 A. Yes.

20 Q. How long did you live at that address in
21 Brightwood?

22 A. Maybe five years.

23 Q. Where did you live before that?

24 A. In Milwaukie area. I lived with my son
25 and my daughter-in-law.

1 Q. Have you ever owned your own home?

2 A. No, I have not.

3 Q. Tell me about your son, Alex. Where is he
4 these days?

5 A. Portland.

6 Q. Are you in contact with him?

7 A. Yes.

8 Q. The restraining orders that you had
9 against him in the past, the one in 2005, tell me
10 what brought that about.

11 A. He was on drugs and frightening.

12 Q. What -- what happened?

13 A. He -- I tried to ask him to leave my
14 parents' home, and he assaulted me.

15 Q. How so?

16 A. I don't understand.

17 Q. How did he assault you, describe what
18 happened.

19 A. Pushed me, threw me. I ran to a
20 neighbor's and called the police.

21 Q. Were there any weapons involved?

22 A. No.

23 Q. And were there any drugs involved?

24 A. I believe he was always on drugs, but I
25 didn't watch him do drugs.

1 Q. Was he arrested?

2 A. I believe so, yes.

3 Q. Was he convicted?

4 A. I believe so. I don't know for sure.

5 Q. Did you -- you would have been a victim in
6 that case, right, so you would have worked with a
7 prosecutor and victim's advocate?

8 A. Yes, but I -- I remember going to --
9 talking to some people, but I don't -- I don't know
10 exactly what happened to him. He must have been
11 convicted, but I don't know.

12 Q. Okay. But you are on good terms with him
13 now?

14 A. Yes, I am, very good terms.

15 Q. Was he involved in a gang?

16 MR. FRANZ: You know, I think this is
17 nothing but harassment. So if you are going to
18 continue this, we are going to get the judge on the
19 line.

20 This has nothing -- there's not an
21 impeachable topic you are talking about. This is,
22 what, 2005? You are just digging up crap and just
23 throwing it out there.

24 MR. LAUERSDORF: We'll go off the Record
25 for a second.

1 **MR. FRANZ:** No, let's stay on the Record.

2 **MR. LAUERSDORF:** Okay. I'm asking her
3 questions about representations she made while sworn
4 in a document that she submitted to the court.

5 I believe that she has a tendency to make
6 misrepresentations and falsify records and submit
7 them to the court. I get to pursue that.

8 **MR. FRANZ:** No, you don't. That's not
9 even admissible, prior bad acts.

10 **MR. LAUERSDORF:** Yes, I do.

11 **MR. FRANZ:** You can't impeach her on a
12 false statement made in 2005. Tell me the -- tell
13 me the --

14 **MR. LAUERSDORF:** All right. Let's get the
15 judge on the line.

16 **MR. FRANZ:** Okay.

17 **THE REPORTER:** Are we going off the
18 Record?

19 **MR. FRANZ:** Yes.

20 **THE REPORTER:** Okay.

21 **MR. FRANZ:** Let me talk to Ms. Cato for a
22 second.

23 **THE REPORTER:** All right, hold on.

24 **MR. FRANZ:** Do you object to this line of
25 questioning?

1 **THE WITNESS:** Yes.

2 **MR. LAUERSDORF:** Are you representing her
3 now?

4 **MR. FRANZ:** I think she has a right to --

5 **MR. LAUERSDORF:** Okay. We're going to
6 talk to the court about that, too.

7 **MR. FRANZ:** If she doesn't object, then
8 fine.

9 **THE REPORTER:** Do you want the call on the
10 Record?

11 **THE VIDEOGRAPHER:** Stand by. The time is
12 now 1:48, and we are off the Record.

13 **(WHEREUPON, a discussion was held off the**
14 **Record.)**

15 **THE VIDEOGRAPHER:** Back on the Record.

16 **MR. LAUERSDORF:** Okay. So this is Andy
17 Lauersdorf, we're back on the Record. After an
18 objection and some conversation off the Record, a
19 couple of attempts to call the court and Judge
20 Kasubhai to help resolve whatever issue it is that
21 the parties are currently facing in this deposition.

22 Before going back on to the Record, Ms.
23 Cato represented to the room, the parties in the
24 room, that she wants to consult a lawyer and that
25 she's not comfortable going forward with her

1 deposition without the assistance of counsel.

2 So with that representation, as far as I'm
3 concerned, we are done until she gets a lawyer.

4 **MR. FRANZ:** I agree. Do you want to go
5 ahead and give her the subpoenas you need to give?

6 **MR. LAUERSDORF:** Yeah.

7 **THE REPORTER:** Sorry, we are still on the
8 Record.

9 **MR. LAUERSDORF:** Yeah, why don't we -- why
10 don't we stay on the Record for the service.

11 **THE REPORTER:** Okay.

12 **UNIDENTIFIED FEMALE:** Can we go off the
13 Record for a minute?

14 **THE REPORTER:** Yes.

15 **THE VIDEOGRAPHER:** Please stand by. The
16 time is 1:57, and we are off the Record.

17 **(WHEREUPON, a recess was taken.)**

18 **THE REPORTER:** Okay. We are back on the
19 Record at 2:19 p.m. We are just continue -- we
20 turned off the video, we are just continuing by
21 reporter. Sorry.

22 **MR. LAUERSDORF:** Okay. This is Andrew
23 Lauersdorf on behalf of Plaintiff. For the Record,
24 I'm just serving Ms. Cato with a subpoena to --
25 commanding her to appear on July 24, 2023 at 9 a.m.

1 in our offices for, I guess, another deposition or
2 to resume this deposition.

3 Ms. Cato, that's for you, along with a
4 check for \$86, which I believe is the round-trip
5 mileage plus the appearance fee. Any questions?

6 **MR. FRANZ:** Is it a subpoena duces tecum?

7 **MR. LAUERSDORF:** No. It's just an
8 appearance subpoena. We will send out a duces tecum
9 when we have it. We have to revise the list a
10 little bit of our documents given her testimony
11 today.

12 **MR. FRANZ:** So she has to come back again?

13 **MR. LAUERSDORF:** No, we will serve her
14 with one in the next couple days --

15 **MR. FRANZ:** Oh, okay.

16 **MR. LAUERSDORF:** -- just telling her to
17 bring the documents. It would be great if she would
18 give the documents to you and you'd give them to us
19 but --

20 **MR. FRANZ:** Whatever I get, I'll give to
21 you guys.

22 **MR. LAUERSDORF:** We are not going to
23 comment on that. Okay.

24 **THE REPORTER:** We are still on the Record.

25 **MR. LAUERSDORF:** Yes, we are still.

1 **THE REPORTER:** Sorry, we are still on the
2 Record.

3 **MR. LAUERSDORF:** The other thing I would
4 just ask, Ms. Cato, is that when you do hire an
5 attorney, if you'd please ask that attorney to call
6 me.

7 **THE WITNESS:** All right.

8 **MR. LAUERSDORF:** Thank you.

9 **THE REPORTER:** Really quickly, I just want
10 to take orders. Mr. Franz, off the Record we spoke
11 that you want to order the transcript and you want
12 it by Monday?

13 **MR. FRANZ:** Yes.

14 **THE REPORTER:** Okay. Mr. Lauersdorf, do
15 you want a copy?

16 **MR. LAUERSDORF:** Yeah, we'll take a
17 condensed.

18 **THE REPORTER:** Okay. And Ms. --

19 **MS. SAWYER:** Sawyer.

20 **THE REPORTER:** Sawyer, thank you.

21 **MS. SAWYER:** I will take a condensed. I
22 do not need it by Monday.

23 **THE REPORTER:** Okay.

24 **MR. LAUERSDORF:** I'll need mine by Monday
25 though.

1 **THE REPORTER:** Okay.

2 **MR. LAUERSDORF:** Going to have some motion
3 practice here, expedited.

4 **THE REPORTER:** Okay. All right. And then
5 Mr. Marshall did leave the room, but he did state
6 that he wanted a copy, condensed, regular delivery.
7 All right. We are off the Record at 2:21 p.m.

8 **(WHEREUPON, the deposition of GABRIELLA**
9 **CATO was adjourned at 2:21 p.m.)**

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CERTIFICATE

I, the undersigned Wyatt Jones, am a videographer on behalf of NAEGELI Deposition & Trial. I do hereby certify that I have accurately made the video recording of the deposition of Gabriella Cato, in the above captioned matter on the 6th day of July, 2023 taken at the location of Maloney Lauersdorf & Reiner PC, 1111 E. Burnside St., Ste. 300, Portland, OR 97214.

No alterations, additions, or deletions were made thereto.

I further certify that I am not related to any of these parties in the matter and I have no financial interest in the outcome of this matter.

A handwritten signature in black ink, appearing to read 'Wyatt Jones', is written over a horizontal line.

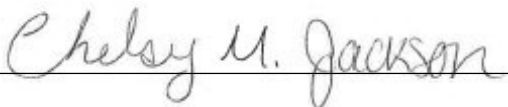
Wyatt Jones

CERTIFICATE

I, Chelsy M. Jackson, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of July, 2023.

A handwritten signature in cursive script, reading "Chelsy M. Jackson", is written over a horizontal line.

Chelsy M. Jackson

DECLARATION

Deposition of: Gabriella Cato Date: 07/06/23

Regarding: McGuffin vs. Dannels

Reporter: Jackson/McAdam

I declare under penalty of perjury the following to be true:

I have read my deposition and the same is true and accurate save and except for any corrections as made by me on the Correction Page herein.

Signed at _____, _____
on the _____ day of _____, 2023.

Signature _____

Gabriella Cato

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